

David H. Krieger, Esq.  
NV Bar No. 9086  
HAINES & KRIEGER, LLC  
8985 S. Eastern Avenue, Suite 130  
Henderson, Nevada 89123  
Phone: (702) 880-5554  
FAX: (702) 385-5518  
dkrieger@hainesandkrieger.com

Danny J. Horen, Esq.  
NV Bar No. 13153  
Kazerouni Law Group, APC  
7854 W. Sahara Avenue  
Las Vegas, NV 89117  
Telephone: (800) 400-6808x7  
Facsimile: (800) 520-5523  
danny@kazlg.com

*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**CECILIA RAMOS,**

Plaintiff,

v.

**CREDIT MANAGEMENT, LP.,  
SYNCHRONY BANK, WELLS  
FARGO FINANCIAL NEVADA,  
INC., and EXPERIAN  
INFORMATION SOLUTIONS,  
INC.**

Defendants.

**Case No.: 2:15-cv-00277-APG-GWF**

**STIPULATION AND |  
ORDER TO EXTEND TIME FOR  
PLAINTIFF TO RESPOND TO  
DEFENDANT WELLS FARGO  
FINANCIAL NEVADA, INC.'S  
MOTION TO DISMISS**

**[FIRST REQUEST]**

Plaintiff, CECILIA RAMOS (“Plaintiff”), and Defendant, WELLS FARGO FINANCIAL NEVADA, INC. (“Wells Fargo”), hereby submit the following Stipulation to Extend Time for Plaintiff to Respond to Wells Fargo’s Motion to Dismiss. The current deadline is set for June 8, 2015.

1. Plaintiff’s Complaint was filed on February 17, 2015. [Dkt. No. 1]
2. Wells Fargo filed its Motion to Dismiss [Dkt. No. 12] on May 22, 2015.
3. Plaintiff and Wells Fargo have agreed to an extension of time of 14 days, up to and including June 22, 2015 for Plaintiff to respond to Wells Fargo’s Motion To Dismiss.
4. This request is not made for purposes of delay, but rather to allow Plaintiff the opportunity to fully brief its Opposition and the parties to explore settlement.

The parties therefore respectfully request this Court enter an order granting an extension of time of 14 days, up to and including June 22, 2015, for Plaintiff to respond to Wells Fargo’s Motion to Dismiss.

DATED: June 8, 2015

SNELL & WILMER

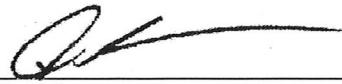
/s/ Karl Riley  
Karl Riley, Esq.  
3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, NV 89169  
matthew.knepper@akerman.com  
Attorneys for Wells Fargo

KAZEROUNI LAW GROUP, APC

/s/ DANNY J. HOREN  
DANNY J. HOREN, ESQ  
7854 W. Sahara Avenue  
Las Vegas, NV 89117  
danny@kazlg.com  
Attorneys for Plaintiff

**SO ORDERED.** Plaintiff shall have 14 days, up to and including June 22, to respond to Wells Fargo’s Motion to Dismiss.

Dated: June 9, 2015.

  
UNITED STATES DISTRICT JUDGE

## SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to counsel for Defendant, and that I have obtained their authorization to affix their electronic signature to this document.

Dated: June 8, 2015

**KAZEROUNI LAW GROUP**

By: */s/ Danny Horen*

DANNY HOREN, ESQ.

ATTORNEY FOR PLAINTIFF